

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NESSA RISLEY, JAMES FREELAND, ROBERT
SCOTT, ANNIE VENESKY, ANDREW CARDIS, and
DEAN MEYERS, Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

UNIVERSAL NAVIGATION INC. d/b/a UNISWAP
LABS, UNISWAP FOUNDATION, HAYDEN Z.
ADAMS, PARADIGM OPERATIONS LP, AH CAPITAL
MANAGEMENT, L.L.C d/b/a ANDREESSEN
HOROWITZ, and UNION SQUARE VENTURES, LLC,

Defendants.

Case No. 22 Civ. 2780 (KPF)

DECLARATION OF BRANDON FETZER

I, Brandon Fetzer, hereby declare as follows:

1. I am an associate at the law firm of Debevoise & Plimpton LLP, counsel for Defendants Universal Navigation Inc. d/b/a/ Uniswap Labs (“Labs”) and Hayden Z. Adams in the above-captioned action. I am a member of the bar of the State of New York and an attorney admitted to practice before the courts of the Southern District of New York. I submit this declaration in support of the motion of Labs and Mr. Adams to dismiss the Amended Complaint (“AC”).

2. Attached hereto as Exhibit 1 is a true and correct copy of a whitepaper titled “Uniswap v2 Core,” dated March 2020, available at <https://uniswap.org/whitepaper.pdf>, which is relied on by Plaintiffs in paragraphs 77, 81-83 and 91-92 of the AC.

3. Attached hereto as Exhibit 2 is a true and correct copy of a webpage titled “How Uniswap Works,” available at <https://docs.uniswap.org/contracts/v2/concepts/protocol-overview/how-uniswap-works>, which is relied on by Plaintiffs in paragraphs 78, 86 and 89 of the AC.

4. Attached hereto as Exhibit 3 is a true and correct copy of a webpage titled “Pools,” available at <https://docs.uniswap.org/contracts/v2/concepts/core-concepts/pools>, which is relied on by Plaintiffs in paragraphs 78-79 and 86 of the AC.

5. Attached hereto as Exhibit 4 is a true and correct copy of a series of tweets by Mr. Adams on July 24, 2021, available at <https://twitter.com/haydenzadams/status/1418961999539712006>, which is relied on by Plaintiffs in paragraph 97 of the AC.

6. Attached hereto as Exhibit 5 is a true and correct copy of a webpage titled “Token access on app.uniswap.org,” dated July 23, 2021, available at <https://uniswap.org/blog/token-access-app>, which is relied on by Plaintiffs in paragraph 190 of the AC.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 21, 2022
New York, New York

/s/ Brandon Fetzer

Brandon Fetzer